

COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP  
MATTHEW F. GATELY  
Park 80 West – Plaza One  
250 Pehle Avenue, Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201/845-9600  
201/845-9423 (fax)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a	)	No. 2:08-cv-00235-CCC-JSA
Delaware Limited Liability Company,	)	
and MICHIGAN MULTI-KING, INC.,	)	<u>CLASS ACTION</u>
a Michigan Corporation, on Behalf of	)	
Themselves and All Those Similarly	)	DECLARATION OF MARK COWEN
Situated,	)	REGARDING NOTICE TO
	)	SETTLEMENT CLASS MEMBERS
Plaintiffs,	)	
	)	
vs.	)	
	)	
THOSE CERTAIN UNDERWRITERS	)	
AT LLOYD'S, LONDON MEMBERS	)	
OF SYNDICATES, et al.	)	
	)	
Defendants.	)	
	)	

---

I, Mark Cowen, hereby declare as follows:

1. I am a Project Manager at A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. This declaration ("Declaration") is based upon my personal knowledge, and that of A.B. Data staff members, and if called as a witness, I could and would testify competently thereto. A.B. Data was appointed as Settlement Administrator and implemented the previous Court-approved notice plans for the earlier settlements in this Action.

2. This Declaration will describe the proposed notice plan ("Notice Plan") to inform Settlement Class Members about the settlements with those Certain Underwriters at Lloyd's, London who are members of Syndicates 727, 1003, 2003, 2020, and 2791.

### **Direct Notice**

3. A.B. Data will provide direct notice to potential Settlement Class Members in the same manner as the previous direct notice implemented in the settlements with Lloyd's Syndicates 0033, 0102, 0382, 0435, 0570, 0609, 0623, 0958, 1183, 1886, 2001, 2623, and 2987 (the "2019 Syndicate Settlement") and 510, 1084, 1096, and 1245 (the "2023 Syndicate Settlement"). Direct notice will be sent via mail, or email, if available, to the names and addresses provided by Settling Defendants from their own records and those of their largest coverholders, names,

and addresses identified in the prior settlement administration in *In re: Insurance Brokerage Antitrust Litigation*, Civil Action No. 05-1079, and the names and addresses of any claimant that submitted an eligible claim in the 2019 and/or 2023 Syndicate Settlements. The Settling Defendants have identified thousands of Settlement Class Members nationwide.

4. A.B. Data will send the Summary Notice, formatted as a postcard (“Postcard Notice”), via First-Class Mail to potential Settlement Class Members. Prior to mailing, A.B. Data will standardize and update all mailing addresses through the United States Postal Service (“USPS”) national change of address (“NCOA”) database. For Settlement Class Members with a registered change of address, A.B. Data will mail a Postcard Notice to the updated mailing address provided by the USPS.

5. For any Postcard Notice returned to A.B. Data by the USPS as undeliverable as addressed (“UAA”) with a forwarding address provided, A.B. Data will promptly remail the Postcard Notice to the forwarding address. For any UAA Postcard Notice returned with no forwarding address provided, A.B. Data will search for an updated address using an information provider to which we subscribe. If an updated address is available, A.B. Data will promptly remail the Postcard Notice to the updated address.

6. A.B Data will send the Summary Notice, in the form of an email (“Email Notice”), to potential Settlement Class Members for whom an email address is available.

7. Prior to emailing, A.B. Data will perform several tasks to maximize deliverability. These tasks include running the list of recipient email addresses through a deliverability analysis to ensure the email addresses are valid and working with our email service providers to use optimal sending strategies. A.B. Data will also incorporate best practices, such as excluding words or phrases known to trigger SPAM or junk filters, not including email attachments, and sending the emails in tranches over a period of days or weeks.

#### **Paid Media**

8. The Notice Plan includes targeted digital and social media advertising that will appear on websites and applications in the United States. Ads will appear across desktop, tablet, and mobile devices for 30 days on the Google Display Network and on LinkedIn. A minimum of 8 million gross impressions<sup>1</sup> will be delivered.

---

<sup>1</sup> Gross (targeted) impressions are the duplicated sum of audiences of all media vehicles containing the notice.

9. Digital ads will be placed on websites associated with the trade publications *Business Insurance*, *Risk Management*, and *Risk & Insurance*.<sup>2</sup>

10. Sponsored search listings will be purchased to appear on Google, the most highly visited search engine, and/or its other search partners. When a person uses a specific target phrase and/or keyword to search for information, the link to the case-specific website may appear on the search result pages.

### **Earned Media**

11. A.B. Data will distribute a news release via *PR Newswire*'s US1 Newswire. The news release will reach traditional media outlets (television, radio, newspapers, and magazines), news websites, and journalists across the United States.

12. Information about the settlements will be shared with the news media through X (formerly Twitter). A.B. Data will also use its account on X to broadcast news about the Settlement.

### **Toll-Free-Telephone Number**

13. A.B. Data will update and maintain the case-specific toll-free telephone number with an interactive voice response ("IVR") system and live operators. The automated IVR system answers calls and presents callers with a series of choices to

---

<sup>2</sup> Publications have the right to refuse advertisements. A.B. Data will make every effort to have the advertising placed on these trade publications' websites or communications but will make substitutions as necessary.

hear prerecorded answers to basic questions. If callers need further assistance, they have the option to speak with a live operator during business hours. After business hours, callers may leave a voicemail message, and their call will be returned.

### **Settlement Website**

14. A.B. Data will update and maintain the dedicated case-specific website to ensure Settlement Class Members can easily access current information about this Action and Settlement. The website is simple to navigate and will provide, among other things, a summary and background about the case, information about Settlement Class Member rights and options, relevant documents, important dates, and any pertinent updates. Settlement Class Members will be able to access Frequently Asked Questions and download copies of key documents, such as the Long-form Notice, Claim Form, Settlement Agreements, and Preliminary Approval Order. Also, an online claim form on the website will allow Settlement Class Members to file a claim electronically. The website is secure, with an “https” designation.

### **Conclusion**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 9th day of April, 2025.



---

MARK COWEN